

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LEGACY RESTORATION, LLC,

Plaintiff,

-against-

OSWALDO “JUNIOR” BARAJAS, USA
CONTRACTING CO, LLC, LEAH RAFFLES, and BRIAN
WOLFF,

Defendants.
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Case No.: 1:25-cv-5319 (LJL) (OTW)

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the accompanying declaration of Leah Raffles dated **July 15, 2025**, the memorandum of law in support, and all the prior papers and proceedings herein, Defendants Oswaldo “Junior” Barajas, Leah Raffles, and Brian Wolff will move this Court, before the Hon. Lewis J. Liman, U.S.D.J. (“Judge Liman”), at the United States District Court for the Southern District of New York, 500 Pearl Street, Courtroom 15C, New York, NY 10007-1312 for an Order disqualifying Margaret Hope Allen, Esq. and the law firm of Sidley Austin, LLP from representing the Plaintiff in this case, and for such other and further relief as the Court deems just, equitable, and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to ¶ 2(F) of Judge Liman’s Individual Practice Rules, this motion may be made without a pre-motion conference.

PLEASE TAKE FURTHER NOTICE, pursuant to ¶ 2(B) of Judge Liman’s Individual Practice Rules, motions “should not include a return date;” therefore, this Motion shall be returnable as directed by the Court.

Dated: Jamaica, New York
July 15, 2025

Respectfully submitted,

SAGE LEGAL LLC

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To: All parties via ECF